

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Jamel Witcher

Case No.

Case: 2:21-mj-30077

Assigned To : Unassigned

Assign. Date : 2/12/2021

Description: USA V. JAMEL
WITCHER (CMP)(MEV)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 25, 2021 in the county of Washtenaw in the
Eastern District of Michigan, the defendant(s) violated:*Code Section*

18 U.S.C. § 922(g)

Offense Description

Prohibited person in possession of a firearm

This criminal complaint is based on these facts:

see attached affidavit.

☒ Continued on the attached sheet.
Complainant's signature

Mark A. Jackson, Special Agent (ATF)

*Printed name and title*Sworn to before me and signed in my presence
and/or by reliable electronic means.Date: February 12, 2021City and state: Detroit, Michigan
Judge's signature

Hon. Kimberly G. Altman, United States Magistrate Judge

Printed name and title

AFFIDAVIT

I, Mark A. Jackson, being duly sworn, hereby state the following:

I. INTRODUCTION AND AGENT BACKGROUND

1. I have been employed as a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives in Detroit, Michigan since 2000. Prior to this, I was employed as a Senior Customs Inspector with the United States Customs Service in Detroit, Michigan for approximately three and a half years. Along with other training I have received, I am a certified law enforcement instructor and regularly teach firearms trafficking courses to ATF and other agencies both at the ATF Academy and at advanced firearms trafficking training courses. I have participated in hundreds of investigations involving violations of federal firearms and narcotics laws, resulting in the arrest and convictions of numerous criminal defendants and the seizure of large quantities of firearms.

2. I make this affidavit from personal knowledge based on my participation in this investigation, including witness interviews by myself and/or other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all details or all facts of which I am aware relating to this investigation.

3. This affidavit is intended to show only that there is sufficient probable cause for the requested warrant, and it does not set forth all of my knowledge about this matter.

4. I am conducting an investigation into a violation of 18 U.S.C. § 922(g) - (prohibited person in possession of a firearm) committed by Jamel WITCHER. This affidavit is being submitted in support of an application for an arrest warrant for Jamel WITCHER.

II. PROBABLE CAUSE

5. On January 24, 2021, at approximately 7:05 pm, Michigan State Police responded to the area of I-94 and Woodward Avenue, Detroit, Michigan on a call of a freeway shooting. At the scene, officers met with the victim of the shooting. The victim described a road rage type incident, where an unknown black male suspect pulled alongside the victim, rolled down his driver's side window, pointed a gun at the victim, and fired several shots into the victim's vehicle. The victim reported the suspect was driving a greyish-white Chevrolet Equinox bearing Virginia license plate UJR5668.

6. Michigan State Police investigated the suspect's vehicle and discovered that the Chevrolet Equinox bearing Virginia plate UJR5668 is a rental vehicle owned by Hertz Rental Company. A Hertz representative told law

enforcement that the vehicle was currently rented by Brenda Saulsberry of XXXX Holmes Road, Ypsilanti, Michigan.

7. On January 25, 2021, Michigan State Police applied for and received a state search warrant for XXXX Holmes Road, Ypsilanti, Michigan. WITCHER and his girlfriend Char-Kisha Roberts were both present in the home at the time Michigan State Police served the warrant. While executing the search warrant, troopers located an American Tactical Imports, model Omni Hybrid, multi-caliber pistol bearing serial number NS185931 under the mattress in the southeast bedroom. Troopers also discovered clothes and a wallet belonging to Jamel WITCHER in the same bedroom. Additionally, when asked, WITCHER and his girlfriend referred to the southeast bedroom as their bedroom. Troopers retrieved additional clothing and shoes for WITCHER from the southeast bedroom prior to transporting him to the post. Michigan State Police took Roberts and WITCHER into custody.

8. Officers advised WITCHER of his *Miranda* rights. He stated he wanted to speak with a lawyer and the interview concluded. While D/Sgt. Clark was placing WITCHER back in the holding cell, WITCHER made several unsolicited comments about being in a road rage incident on I-94. Later, while officers were transporting him to the Detroit Detention Center, WITCHER made several unsolicited comments to Trooper Harba, including that he was on parole

for a case out of Ohio and several more comments about being in a road rage incident and shooting the victim.

9. On February 8, 2021, I reviewed Jamel WITCHER's criminal history and parole report. WITCHER was convicted in 2014 in Ohio for felony Delivery/Manufacture/Possession of a Controlled Substance. WITCHER was paroled for this offense in 2018 and has a discharge date of November, 2023.

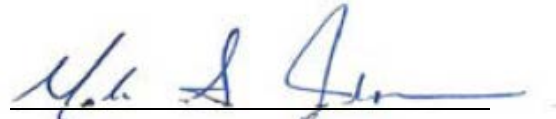
10. On February 9, 2021, I received confirmation from Special Agent Shannon Richardson that the American Tactical Imports Omni handgun bearing serial number NS185931 was manufactured outside the State of Michigan, thus travelling in interstate commerce.

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III. CONCLUSION

11. Based on these facts, I have probable cause to believe that Jamel WITCHER, knowing that he was previously convicted of a felony, did unlawfully possess a firearm in violation of 18 U.S.C. § 922(g).

Respectfully submitted,



Mark A. Jackson, Special Agent
Bureau of Alcohol, Tobacco,
Firearms and Explosives

Sworn to before me and signed in my
presence and/or by reliable electronic means.



HON. KIMBERLY G. ALTMAN
UNITED STATES MAGISTRATE JUDGE

Date: February 12, 2021